

**IN THE COMMON PLEAS COURT FOR FRANKLIN COUNTY, OHIO**

SHERIDA SIMPSON :  
 7367 Brooke Boulevard :  
 Reynoldsburg, Ohio 43068 :

and :

JEREMY MCLINN :  
 7367 Brooke Boulevard :  
 Reynoldsburg, Ohio 43068 :

Plaintiffs : CASE NO.

v. : JUDGE

CITY OF COLUMBUS, DIVISION OF :  
 POLICE :  
 120 Marconi Boulevard :  
 Columbus, Ohio 43215 :

Defendant

**PLAINTIFFS SHERIDA SIMPSMN AND JEREMY MCLINN'S COMPLAINT**  
**(w/ Jury Demand)**

NOW COME Plaintiffs Sherida Simpson ("Simpson") and Jeremy Mclinn ("Mclinn")  
 and hereby proffer this Complaint for damages and equitable relief against Defendant City of  
 Columbus, Division of Police.

1. Each Plaintiff is a natural African American person residing in the State of Ohio.
2. Defendant is the police division of a municipal corporation located in Franklin County,  
 Ohio.
3. On November 23, 2022, at or around 1:53 p.m., Simpson rented a U-Haul Truck from U-  
 Haul's location at 111 Parsons Avenue, Columbus.

4. After filling out the rental paperwork at U-Haul, Simpson had her cousin Mclinn follow her out to where she lived off of the intersection of Rohr and Lockbourne Roads. She drove her own car and Mclinn followed driving the U-Haul rental vehicle.
5. As her and Mclinn drove, Simpson noticed they were being followed by police vehicles (more than one).
6. At the corner of Rohr and Lockbourne Roads, multiple (at least five) police vehicles surrounded Simpson and Mclinn causing them to pull off the road. Multiple police jumped from their cruisers with guns drawn pointing them at Mclinn and Simpson. They ordered Mclinn from the vehicle, forced him onto his stomach on the pavement, handcuffed him behind his back, and took him to sit in the back of a police cruiser, while Simpson witnessed the whole process with guns pointed at her, as well.
7. Simpson finally convinced the police officers to look at the rental paperwork, which she was carrying in her car. The police then appeared to call U-Haul to verify the rental, then returned the paperwork to Simpson and freed and unshackled Mclinn from the cruiser.
8. Plaintiffs assert that the police personnel had no reason to believe they had stolen the U-Haul vehicle other than their race.
9. Plaintiffs assert that even if the police personnel had some reason to believe the U-Haul vehicle was stolen, they had no reason to treat Simpson and Mclinn as harshly as they did in checking out the situation as neither Plaintiff posed a patent, imminent threat.
10. Plaintiffs were put in fear of their lives and safety by being faced with multiple police persons with guns drawn and pointed at them, and Mclinn was unjustifiably humiliated, shackled and detained.

**COUNT I**  
**VIOLATIONS OF 29 U.S.C. § 1983**

11. Plaintiff reincorporates all allegations set forth above as if fully rewritten here.
12. Plaintiffs were unjustifiably treated as dangerous criminals because of their race in violation of the 14<sup>th</sup> Amendment Equal Protection Clause of the U.S. Constitution.
13. Defendant used unjustified and imminent threats of lethal force that unnecessarily put Plaintiffs in fear of their lives and safety.
14. Defendant's Constitutional violations entitle Plaintiffs to compensatory damages, attorney fees and costs in an amount to be determined at trial, but in any event not less than \$25,000 each.

**WHEREFORE**, Plaintiffs demand,

for Count I, compensatory damages and attorney fees and costs of bringing this litigation in an amount to be determined at trial, but in any event not less than \$25,000.00 for each Plaintiff.

**JURY DEMAND**

Plaintiffs demand that a jury decide their claims.

Respectfully Submitted,

s/ Gary A. Reeve  
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